



REMARKS

Claim Rejections

Claims 1 and 2 are rejected under 35 U.S.C. 103(a) as being unpatentable over USPN 6,902,300 B2 to Lee. Claims 3 and 4 are rejected under 35 U.S.C. 103(a) as being unpatentable over USPN 6,902,300 B2 to Lee in view of USPN 6,652,109 B2 to Nakamura.

Arguments

Applicant traverses the Examiner's rejections of claims 1-4 by virtue of the arguments which follow.

Applicant teaches a back light module including, *inter alia*, a lamp case with a diffuser board having a plurality of bottom support members **formed integral with a bottom wall thereof** and respectively stopped at the bottom wall of the lamp case to support the diffuser board against deformation.

Lee teaches a back light assembly having diffusion plate supporters 60 mounted between reflection sheet 40 and diffusion plate 50. It is important to note that diffusion plate supporters 60 are not integrally formed with a bottom wall of the mold frame 10, but are rather **screwed** to the mold frame 10.

The Examiner has stated on p. 3 of the outstanding Office Action:

USPN 6,902,300 B2 to Lee discloses the claimed invention except for having the support members formed integral with a bottom wall of diffusing board. It would have been obvious to one of ordinary skill in the art at the time of the invention to incorporate having the support members formed integral with a bottom wall of diffusing board to USPN 6,902,300 B2 to Lee because it has been held that lacking any criticality, to make prior art parts integral does not make the claimed invention patentable over that prior art (*In re Larson*, 144 USPQ 347 [CCPA 1965]). The reason for making the parts integral is to reduce the number of parts.

In response, Applicant notes that Applicant has, in the specification as filed, clearly taught the criticality of integrally forming the bottom support members with the bottom wall. Specifically, Applicant explicitly teaches that integrally forming the supports reduces the cost of manufacturing, a critical element in the highly

competitive LCD manufacturing field. Furthermore, Applicant implicitly teaches an advantage of integrally formed supports by noting that the designs of prior art structures, such as those shown in Fig. 2, are problematic "because the support members **D** are respectively and perpendicularly fastened to the bottom wall of the casing **A** by a respective screw joint, it is difficult to keep the top ends of the support members **D** in flush." In other words, supports which are screwed into place do not offer as consistent support to the diffusion plate and, thus, do not prevent deformation thereof as effectively. In fact, the structure disclosed in Lee is precisely the type of diffusion plate support which Applicant has disclosed the shortcomings of and, as a result, has offered the improved structure recited in claims 1-4 which offers better protection against deformation than non-integrally formed supports.

In view of the above showing of criticality, Applicant respectfully submits that the Examiner must now either withdraw the rejections under 35 U.S.C. § 103(a) OR make a showing of a *prima facie* case of obviousness by citing teaching from the art which teach each and every features of Applicant's recited invention, as well as providing a motivation or suggestion from the art to combine such teachings.

In considering Applicant's invention, Applicant respectfully asks the Examiner not to assume the obviousness of Applicant's invention based on the simplicity of Applicant's improvement. It is important to remember that "[s]implicity is not inimical to patentability." *In re Oetiker*, 24 USPQ2d 1443, 1446 (Fed. Cir. 1992). In fact, "[s]implicity can actually be proof of nonobviousness. *In re Sporch*, 133 USPQ 360, 363 (CCPA 1962).

Applicant also notes that Nakamura fails to teach diffusion board supporters which are integrally formed with a bottom wall of a lamp case.

It follows from the above that even if the teachings of Lee and Nakamura were combined, as suggested by the Examiner, the resultant combination does not suggest: a back light module including a lamp case with a diffuser board having a plurality of bottom support members formed integral with a bottom wall thereof and respectively stopped at the bottom wall of the lamp case to support the diffuser board against deformation.

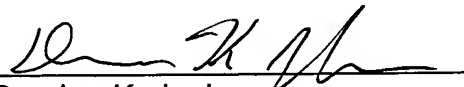
Summary

In view of the foregoing remarks, Applicant submits that this application is now in condition for allowance and such action is respectfully requested. Should any points remain in issue, which the Examiner feels could best be resolved by either a personal or a telephone interview, it is urged that Applicant's local attorney be contacted at the exchange listed below.

Respectfully submitted,

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By:


Demian K. Jackson
Reg. No. 57,551

TROXELL LAW OFFICE PLLC
5205 Leesburg Pike, Suite 1404
Falls Church, Virginia 22041
Telephone: 703 575-2711
Telefax: 703 575-2707

CUSTOMER NUMBER: 40144